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*Attorneys for Defendants*  
Philippe Ziade, Jude Nassar, Appleton  
Properties, LLC, Z Leb Group, LLC,  
Progressive Construction, Inc., Growth  
Development, LLC, Vibrant Realty, LLC,  
AJ Properties International, LLC, AJ Properties  
International Series 2, LLC, Growth Holdings,  
LLC, Growth Luxury Homes, LLC, and  
Growth Luxury Realty, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Nikkei Global Inc., a California corporation,

Plaintiff,

vs.

Co-Partner Consortium ("Partner-CO"), a  
Nevada general partnership associated in fact  
and as an enterprise per 18 USCA § 1961(3);  
Mr. Phillip Ziade, Nevada resident and co-  
partner; Mr. Jude E. Nassar, an individual  
resident of Clark County, Nevada; Appleton  
Properties, LLC, a Nevada limited liability  
company; Z Leb Group, LLC, a Nevada limited  
liability company; Progressive Construction,  
Inc. a/k/a Growth Construction, a Nevada  
corporation; Growth Development, LLC a/k/a  
Growth Construction, a Nevada limited liability  
company, Vibrant Realty, LLC, a Nevada  
limited liability company; AJ Properties  
International, LLC, a/k/a AJ1, a Nevada limited  
liability company; AJ Properties International  
Series 2 LLC, a/k/a AJ2, a Nevada limited

Case No. 2:18-cv-02013-JCM-GWF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANTS PHILIPPE ZIADE,  
JUDE NASSAR, APPLETON  
PROPERTIES, LLC, Z LEB GROUP,  
LLC, PROGRESSIVE  
CONSTRUCTION, INC., GROWTH  
DEVELOPMENT, LLC, VIBRANT  
REALTY, LLC, AJ PROPERTIES  
INTERNATIONAL, LLC, AJ  
PROPERTIES INTERNATIONAL  
SERIES 2, LLC, GROWTH HOLDINGS,  
LLC, GROWTH LUXURY HOMES,  
LLC, AND GROWTH LUXURY  
REALTY, LLC TO RESPOND TO  
NIKKEI GLOBAL INC'S COMPLAINT**

(First Request)

liability company; Growth Holdings, a Nevada corporation; Growth Luxury Homes, LLC, a/k/a GLH, a Nevada limited liability company; Growth Luxury Realty, LLC, a/k/a GLR, a Nevada limited liability company; Mr. Yoshimi Hirooka, a resident of Japan or Singapore, doing business in Nevada; Mr. Yoshihiro Hirooka, a resident of Japan or Singapore doing business in Nevada; Hirooka Family Office, Ltd., a foreign organization doing business in Nevada,

Defendants.

Plaintiff Nikkei Global Inc. (“Nikkei”), and Defendants Philippe Ziade, Jude Nassar, Appleton Properties, LLC, Z Leb Group, LLC, Progressive Construction, Inc., Growth Development, LLC, Vibrant Realty, LLC, AJ Properties International, LLC, AJ Properties International Series 2, LLC, Growth Holdings, LLC, Growth Luxury Homes, LLC, and Growth Luxury Realty, LLC (collectively, the “Ziade Defendants”), by and through their respective counsel, stipulate and agree as follows:

1. On October 18, 2018, Nikkei filed its Complaint [ECF No. 1] (the “Complaint”);
2. On November 19, 2018, the Ziade Defendants accepted service of the Complaint.
3. The current deadline for the Ziade Defendants to respond to the Complaint is December 10, 2018.
4. The Ziade Defendants recently formally retained undersigned counsel to represent them in this litigation, and undersigned counsel needs adequate time to review and analyze the matter before preparing a response to the Complaint.
5. Further, undersigned counsel has been summoned to appear for jury duty in the Eighth Judicial District Court on December 6, 2018.
6. With the holiday season approaching, the parties have agreed to extend the time for the Ziade Defendants to respond to the Complaint until January 4, 2019.

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7. This is the first stipulation to extend the deadline to file a response to the Complaint.  
This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 5<sup>th</sup> day of December, 2018.

DATED this 5<sup>th</sup> day of December, 2018.

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

BAILEY ♦ KENNEDY

By: /s/ Joseph Liebman  
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By: /s/ Richard Dreitzer  
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*Attorneys for the Ziade Defendants*

*Attorneys for Plaintiff Nikkei Global Inc.*

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 12-06-2018